



U.S. Department of Justice

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Via ECF

Hon. Brian R. Martinotti
United States District Judge
Frank R. Lautenberg Post Office
& U.S. Courthouse
2 Federal Square
Newark, NJ 07102

Re: *United States v. Syed, et al.*
Crim. No. 22-818

Dear Judge Martinotti:

The Government respectfully submits this letter requesting a 30-day extension of time to respond to the Court's February 27, 2025 Order directing the Government, within two weeks of the Order, to (i) identify the audio, video, and tape recordings it seeks to use at trial, and (ii) identify the co-conspirator hearsay statements and/or portions thereof it seeks to use at trial. Dkt. No. 211.¹

The Government believes that a 30-day extension is appropriate given (i) the volume of material to be reviewed to make the identifications required by the Order, (ii) the fact that, although the trial has not yet been scheduled, the Government's identifications in response to the Order likely will bear on the admissibility of that evidence at any forthcoming trial, and (iii) the status of plea negotiations, which may in the interim render aspects of the Order moot.

Counsel for each of Abid Syed, Tariq Din, and Muhammad Aurangzeb consents to this request.

¹ The Order also directed the Government to submit an *ex parte* letter to the Court providing detailed explanations for issuing post-Indictment grand jury subpoenas, which it already has done.

Thank you for your consideration.

Respectfully submitted,

JOHN GIORDANO
United States Attorney

By: /s/ Jessica R. Ecker
Jessica R. Ecker
Assistant U.S. Attorney